

1 AARON D. FORD
2 Attorney General
3 DOUGLAS R. RANDS, Bar No. 3572
4 Senior Deputy Attorney General
5 State of Nevada
6 100 N. Carson Street
7 Carson City, NV 89701-4717
8 Tel: (775) 684-1150
9 E-mail: drands@ag.nv.gov

10 *Attorneys for Defendants*
11 *John Keast and Martin Naughton,*

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ERIN WARE,

Plaintiff,

vs.

M. SULLIVAN, et al.

Defendants.

Case No. 3:22-cv-00037-ART-CSD

**LIMITED NON-OPPOSITION TO
PLAINTIFF'S MOTION TO RE-OPEN
DISCOVERY
(ECF No. 68)**

Defendants, John Keast and Martin Naughton, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, hereby notify the Court that they have no stringent opposition to the Court reopening discovery as outlined in Plaintiff's motion, (ECF No. 68). However, if the Court is reopening discovery and setting new deadlines, a new dispositive motion deadline should be set as well. While the Court has already denied the Motion for Summary Judgment filed by the Defendants in this action, new discovery may reveal

///

///

///

///

///

1 evidence that would support a renewal of the original motion. Therefore, respectfully,
2 the Court should add a dispositive motion deadline to the new schedule.

3 DATED this 30th day of April, 2025.

4 AARON D. FORD
5 Attorney General

6 By: /s/ Douglas R. Rands
7 DOUGLAS R. RANDS, Bar No. 3572
Senior Deputy Attorney General

8 *Attorneys for Defendants*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on April 30, 2025, I electronically filed the foregoing, **LIMITED NON-OPPPOSITION TO PLAINTIFF'S MOTION TO RE-OPEN DISCOVERY (ECF No. 68)**, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

Luke Busby, Esq.
Attorney at Law
316 California Avenue
Reno, Nevada 89509

An employee of the
Office of the Nevada Attorney General